U.S. DISTRICT COURT EASTERN DISTRICT OF TEXAS

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

DEC - 6 2023

UNITED STATES OF AMERICA	§ SEALED DEPUTY
ν.	8 No. 4:23CR 268 8 Judge SDT
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ROBBERTA MARIE KHAN (4) a/k/a Roberta Marie Khan,	\$ \$ \$ \$
a/k/a Ember, a/k/a Scarecrow	§ §

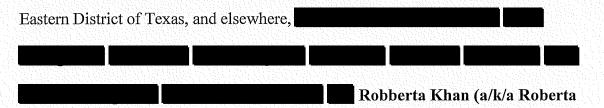
INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 18 U.S.C. §§ 2422(a) & 2 (Coercion and Enticement and Aiding and Abetting)

Between on or about January 21, 2021, and on or about January 27, 2021, in the



Marie Khan, a/k/a Ember, a/k/a Scarecrow), defendants, did knowingly persuade, induce, entice, and coerce an individual, and did knowingly attempt to persuade, induce,

entice, and coerce an individual, that is, Victim 1, to travel in interstate commerce, from the State of Ohio to the Eastern District of Texas, to engage in prostitution and any sexual activity for which any person can be charged with a criminal offense, and aided and abetted in the same.

In violation of 18 U.S.C. §§ 2422(a) and 2.

Count Two

Violation: 18 U.S.C. § 1594(c) (Conspiracy to Commit Sex Trafficking by Force, Fraud, and Coercion)

Between in or about 2020, and continuing until the present, in the Eastern

District of Texas, and elsewhere,

defendants, in and affecting interstate and foreign commerce, did conspire with each other and with individuals known and unknown to the Grand Jury to knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means an individual(s) known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause those individuals to engage in a commercial sex act, in violation of 18 U.S.C. § 1591(a)(1).

In violation of 18 U.S.C. § 1594(c).

NOTICE OF FORFEITURE

Pursuant to 18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 982(a)(1), 18 U.S.C. § 2428(a)(1), 28 U.S.C. § 2461, and 18 U.S.C. §§ 1594(d) & (e), upon conviction of the offense(s) alleged in this Indictment, the defendants,

and Robberta Marie Khan (a/k/a Roberta Marie Khan, a/k/a Ember, a/k/a Scarecrow) shall forfeit to the United States their interest in all property, real or personal, that constitutes or is derived from proceeds traceable to the aforementioned violations, including but not limited to the following property:

- a. 2008 Landrover Range Rover, bearing Texas license plate TBG3458 and VIN number SALSK25488A183270;
- b. 2002 Mercedes G Wagon, bearing Texas license plate TGX1981 and VIN number WDCYR49EX2X129477;
- c. 2003 Dodge Viper, bearing Texas license plate RSF9294 and VIN number 1B3JR65Z73V500413;
- d. 2014 Mercedes Benz E Class, bearing Texas temporary buyers license plate 410L76 and VIN number WDDKJ5KB5EF248904; and
- e. All such proceeds and/or instrumentalities are subject to forfeiture by the government.

If any of the property described above as being subject to forfeiture, as a result of any act of omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third person;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been comingled with other property, which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b)(1) and 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the above-forfeitable property, including but not limited to all property, both real and personal owned by the defendants.

A TRUE BILL

GRAND JURY FOREFERSON

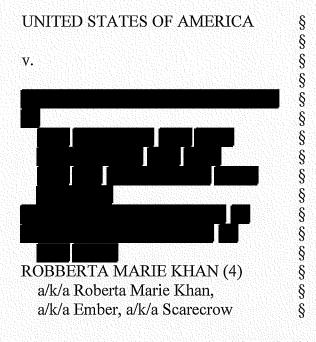
DAMIEN M. DIGGS UNITED STATES ATTORNEY

MARISA J. MILLER

Assistant United States Attorney

Date: |2|6|23

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION



SEALED

No. 4:23CR 26 8 Judge SD5

NOTICE OF PENALTY

Count One

Violation:

18 U.S.C. §§ 2422(a) and 2

Penalty:

Imprisonment for not more than twenty years; a fine of not more than \$250,000; and a term of supervised release of not

less than five years to life.

Special Assessment: \$100.00

Count Two

Violation:

18 U.S.C. § 1594(c)

Penalty:

Imprisonment for not more than life; a fine of not more than

\$250,000; and a term of supervised release of not less than

five years to life.

Special Assessment: \$100.00